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Attorneys for Plaintiff
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSEPH PEREZ, an individual ,

Plaintiff,

vs.

CHARLES DANIELS, et al.,

Defendants.

Case No. 2:21-cv-02061-CDS-MDC

**STIPULATION AND ORDER TO EXTEND TIME
TO AMEND THE FIRST AMENDED
COMPLAINT (FIRST REQUEST)**

Pursuant to Local Rule 7-1, Plaintiff Joseph Perez (“Perez”) and Defendants Terrence Agustin, Arianna Arynhard, Gregory Bryan, Arturo Buen, Charles Daniel, Glenn Fowler, Justin Gordon, Benedicto Gutierrez, Calvin Johnson, Teodoro Manalang, Michael Minev, Jennifer Nash, Brian Williams, and Richard Wulff (collectively, “Defendants”), by and through their counsel of record, do hereby stipulate and agree as follows:

1. On April 7, 2022, Perez filed his First Amended Complaint, doing so pro se [ECF No. 6.]
2. On July 14, 2023, Defendants filed the Motion to Dismiss (the “Motion”) [ECF No. 37.]
3. On August 11, 2023, Perez, through his counsel of record, filed his Response to the Motion [ECF No. 45.]

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4. On August 18, 2023, Defendant's filed their Reply in Support of the Motion [ECF No. 46.]

5. On March 31, 2024, this Court entered its Order Granting in Part and Denying in Part the Motion (the "Order") [ECF No. 50.]

6. As part of the Order, this Court gave Perez leave to amend the First Amended Complaint.

7. Presently, the deadline to file the Second Amended Complaint is April 22, 2024.

8. Given difficulties involved in communicating with Perez concerning the Order, the First Amended Complaint, and the potential amendments to the First Amended Complaint; and given Perez's counsel's ethical obligation to consult with Perez on substantive matters like this, the parties hereby stipulate and agree that Perez's deadline to amend the First Amended Complaint shall be extended from April 22, 2024, to June 1, 2024.

9. This is the first stipulation for an extension of time to amend the First Amended Complaint. This stipulation is made in good faith and not to delay the proceedings.

DATED this 19th day of April, 2024.

DATED this 19th day of April, 2024.

BAILEY ♦ KENNEDY

OFFICE OF THE ATTORNEY GENERAL

By: /s/ Tayler D. Bingham
JOHN R. BAILEY
SARAH E. HARMON
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By: /s/ Leo T. Hendges
AARON D. FORD
LEO T. HENDGES

*Attorneys for Plaintiff
Joseph Perez*

Attorneys for Defendants

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 4/19/24